

UNITED STATES DISTRICT COURT
DISTRICT OF MASSACHUSETTS

HAYAT SINDI,

Plaintiff,

v.

SAMIA EL-MOSLIMANY, and
ANN EL-MOSLIMANY,

Defendants.

No.: 1:13-cv-10798-IT

SPECIAL JURY VERDICT FORM

Plaintiff's Claim for Defamation Against Samia El-Moslimany

- 1(a). Do you find that the Plaintiff has proved by a preponderance of the evidence that (i) Samia El-Moslimany published a statement (or statements) of and concerning Dr. Sindi, (ii) that the statement (or statements) about Dr. Sindi were false and defamatory and (iii) the defamatory statement (or statements) either caused Plaintiff economic loss or is of the type that is actionable without proof of economic loss?

Yes ☒ No ☐

If you answered Question 1(a) YES then proceed to Question 1(b).

If you answered Question 1(a) NO then proceed to Question 2(a).

- 1(b). Do you find by clear and convincing evidence that Samia El-Moslimany published the defamatory statement (or statements) with knowledge that it was false or with reckless disregard of whether it was false or not?

Yes ☒ No ☐

If you answered Question 1(b) YES then proceed to Question 1(c).

If you answered Question 1(b) NO then proceed to Question 2(a)

- 1(c). What amount of money, if any, will fairly compensate the plaintiff for her injury or damages caused by Samia El-Moslimany defaming the plaintiff?

\$ 400,000 (write in figures)

Four hundred thousand dollars (write in words)

Please proceed to Question 2(a).

Plaintiff's Claim for Intentional Interference with Contractual Relationships
Against Samia El-Moslimany

2(a). Do you find by a preponderance of the evidence that Samia El-Moslimany intentionally interfered with plaintiff's contractual relationships? _____

Yes ✓ No _____

If you answered NO to Question 2(a) then proceed to Question 3(a).

If you answered YES to Question 2(a) then proceed to Question 2(b).

2(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Samia El-Moslimany interfering with the plaintiff's contractual relationships? _____

Yes ✓ No _____

If you answered NO to Question 2(b) then proceed to Question 3(a).

If you answered YES to Question 2(b) then proceed to Question 2(c).

2(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Samia El-Moslimany's interfering with the plaintiff's contractual relationships?

\$ 2,000,000 (write in figures)

Two million dollars (write in words)

Please proceed to Question 3(a).

Plaintiff's Claim for Intentional Interference with Prospective Business Relations
Against Samia El-Moslimany

3(a). Do you find by a preponderance of the evidence that Samia El-Moslimany intentionally interfered with the plaintiff's prospective business relationships?

Yes ☒ No ☐

If you answered NO to Question 3(a) then proceed to Question 4(a).

If you answered YES to Question 3(a) then proceed to Question 3(b).

3(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Samia El-Moslimany interfering with the plaintiff's prospective business relationships?

Yes ☒ No ☐

If you answered NO to Question 3(b) then proceed to Question 4(a).

If you answered YES to Question 3(b) then proceed to Question 3(c).

3(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Samia El-Moslimany interfering with the plaintiff's prospective business relationships?

\$ 400,000 (write in figures)

Four hundred thousand dollars (write in words)

Please proceed to Question 4(a).

Plaintiff's Claim for Intentional Infliction of Emotional Distress Against Samia El-Moslimany

4(a). Do you find by a preponderance of the evidence that Samia El-Moslimany intentionally caused the plaintiff to suffer severe emotional distress?

Yes ☒ No ☐

If you answered NO to Question 4(a) then proceed to Question 5(a).

If you answered YES to Question 4(a) then proceed to Question 4(b).

4(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Samia El-Moslimany causing the plaintiff to suffer severe emotional distress?

Yes ☒ No ☐

If you answered NO to Question 4(b) then proceed to Question 5(a).

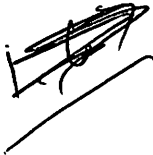
If you answered YES to Question 4(b) then proceed to Question 4(c).

4(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Samia El-Moslimany causing the plaintiff to suffer severe emotional distress?

\$ 100,000 (write in figures)

One hundred thousand dollars (write in words)

Please proceed to Question 5(a).



Plaintiff's Claim for Defamation Against Ann El-Moslimany

- 5(a). Do you find that the Plaintiff has proved by a preponderance of the evidence that (i) Ann El-Moslimany published a statement (or statements) of and concerning Dr. Sindi, (ii) that the statement (or statements) about Dr. Sindi were false and defamatory and (iii) the defamatory statement (or statements) either caused Plaintiff economic loss or is of the type that is actionable without proof of economic loss?

Yes ✓ No

If you answered Question 5(a) YES then proceed to Question 5(b).
If you answered Question 5(a) NO then proceed to Question 6(a).

- 5(b). Do you find by clear and convincing evidence that Ann El-Moslimany published the defamatory statement (or statements) with knowledge that it was false or with reckless disregard of whether it was false or not?

Yes ✓ No

If you answered Question 5(b) YES then proceed to Question 5(c).
If you answered Question 5(b) NO then proceed to Question 6(a)

- 5(c). What amount of money, if any, will fairly compensate the plaintiff for her injury or damages caused by Ann El-Moslimany defaming the plaintiff?

\$ 100,000 (write in figures)

One hundred thousand dollars (write in words)

Please proceed to Question 6(a).

Plaintiff's Claim for Intentional Interference with Contractual Relationships
Against Ann El-Moslimany

6(a). Do you find by a preponderance of the evidence that Ann El-Moslimany intentionally interfered with plaintiff's contractual relationships?

Yes ✓ No

If you answered NO to Question 6(a) then proceed to Question 7(a).

If you answered YES to Question 6(a) then proceed to Question 6(b).

6(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Ann El-Moslimany interfering with the plaintiff's contractual relationships?

Yes ✓ No

If you answered NO to Question 6(b) then proceed to Question 7(a).

If you answered YES to Question 6(b) then proceed to Question 6(c).

6(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Ann El-Moslimany's interfering with the plaintiff's contractual relationships?

\$ 400,000 (write in figures)

Four hundred thousand dollars (write in words)

Please proceed to Question 7(a).

Plaintiff's Claim for Intentional Interference with Prospective Business Relations
Against Ann El-Moslimany

7(a). Do you find by a preponderance of the evidence that Ann El-Moslimany intentionally interfered with the plaintiff's prospective business relationships?

Yes ✓ No

If you answered NO to Question 7(a) then proceed to Question 8(a).
If you answered YES to Question 7(a) then proceed to Question 7(b).

7(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Ann El-Moslimany interfering with the plaintiff's prospective business relationships?

Yes ✓ No

If you answered NO to Question 7(b) then proceed to Question 8(a).
If you answered YES to Question 7(b) then proceed to Question 7(c).

7(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Ann El-Moslimany interfering with the plaintiff's prospective business relationships?

\$ 100,000 (write in figures)

One hundred thousand dollars (write in words)

Please proceed to Question 8(a).

Plaintiff's Claim for Intentional Infliction of Emotional Distress Against Ann El-Moslimany

8(a). Do you find by a preponderance of the evidence that Ann El-Moslimany intentionally caused the plaintiff to suffer severe emotional distress?

Yes ✓ No

If you answered NO to Question 8(a), you have completed the Verdict Slip.

If you answered YES to Question 8(a) then proceed to Question 8(b).

8(b). Do you find by a preponderance of the evidence that the plaintiff suffered damages as a result of Ann El-Moslimany causing the plaintiff to suffer severe emotional distress?

Yes No ✓

If you answered NO to Question 8(b), you have completed the Verdict Slip.

If you answered YES to Question 8(b) then proceed to Question 8(c).

8(c). What amount of money will fairly compensate the plaintiff for her injuries or damages which were caused by Ann El-Moslimany causing the plaintiff to suffer severe emotional distress?

\$ 25,000.00 (write in figures)

_____ (write in words)

The foreperson of the jury should sign this verdict form in the space provided below. The foreperson should then inform the court security officer that the jury has reached a verdict. The foreperson will submit this verdict form to the deputy clerk in open court.

I certify that the above answers represent the unanimous verdict of the all of the jurors.

Rebecca Blum
Foreperson

7/20/2016
Date